Attorney Docket No. 10559-105001
Application No. 09/458,370
Amendment dated June 30, 2004
Reply to Office Action dated March 31, 2004

REMARKS

Reconsideration and allowance of the above-referenced

application are respectfully requested.

Claims 15 and 19 stand rejected under 35 USC 112, first

paragraph, based on errors in the claims as written. Claim 15

has been amended to switch the first and second cosine

calculators to obviate this rejection. The Examiner is thanked

for his careful consideration of this issue.

The objections to claims 19 and 23 have also been obviated

herein by amendment.

Claims 1, 4-8, 11-15, 19-21, 23-25 and 28 stand rejected

under 35 USC 102(b) as allegedly being anticipated by Tanaka.

This contention remains respectfully traversed. Initially, the

Examiner is thanked for carefully explaining his position on

pages 2 and 3 of the detailed action. Also, the undersigned

meant no disrespect by stating that the interpretation "mixes

the different Tanaka embodiments", and apologizes if the

statement was taken that way.

In item 4, the Examiner points out the specific

interpretation which is used. This interpretation explains how

the different DCT calculators in Tanaka read and write the

information. Tanaka apparently alternates the directions in

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which the data is written. For example, DCT calculator 4 writes

the address 0, 0, column 11, line 24, after which the memory

addresses change to 01 (column direction) and the one-

dimensional DCT calculator 6 reads data from this address.

Subsequently, the results of the DCT calculator 4 are written to

the address 0,1 as data. This is summarized in figure 10 where

the first reading direction is shown in the column direction,

and the second writing direction is shown in the column

direction. Thereafter, the row and column address devices are

switched. When that happens, the DCT calculator reads in the

row direction and vice versa.

Note however, that in the system of Tanaka, there is no

provision, and in fact no reasonable way, in which the devices

could operate <u>at the same time and in the same direction</u>.

Clearly, as the rejection points out, the devices may alternate

directions. However, note the way Tanaka describes the

operation. First an address is read; see, column 11, lines 18-

20. "Then" the data is read; see, column 11, lines 20-22.

"Subsequently" the calculated results are written (lines 26-28).

The paragraph beginning at column 11, line 58, explains how once

one operation is completed, the switching circuits are switched.

Column 12 describes how reading with respect to one memory can

be performed at the same time his writing during the other

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memory unit. However, these must inherently be going in

different directions at the same time. Nowhere is there any

teaching or suggestion that the calculators operate

simultaneously in a column direction at a first time, and in a

row direction at a second time. The DCT calculators are always

operating in opposite directions. They do not teach or suggest

operating simultaneously in the same direction at the same time,

as claimed.

It is believed that all of the pending claims have been

addressed in this paper. However, failure to address a specific

rejection, issue or comment, does not signify agreement with or

concession of that rejection, issue or comment. In addition,

because the arguments made above are not intended to be

exhaustive, there may be reasons for patentability of any or all

pending claims (or other claims) that have not been expressed.

Finally, nothing in this paper should be construed as an intent

to concede any issue with regard to any claim, except as

specifically stated in this paper, and the amendment of any

claim does not necessarily signify concession of unpatentability

of the claim prior to its amendment.

In view of the above amendments and remarks, therefore, all

of the claims should be in condition for allowance. A formal

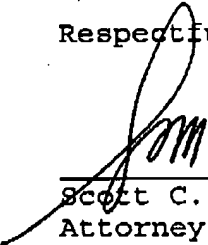notice to that effect is respectfully solicited.

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Respectfully submitted,

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